

### REMARKS

In response to the Notice of Non-Compliance, all Claims 1 - 10 have been cancelled and re-written as new Claims 11 - 20.

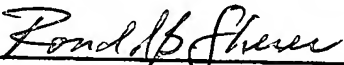
With respect to new Claim 11, it will be noted that this claim defines Applicant's new, unique and proven commercially successful drilling apparatus for continuous circulation of the drilling fluid while simultaneously adding or removing tubulars to and from the drill string. This extremely valuable method has never been successfully accomplished before despite the many, many years of other drilling systems designed by many, many drilling experts. In this regard it will be noted that Claims 11, 14 - 17 and 20 recite both first and second gripping means for gripping both the tubular and the drill string during the connection or disconnection of tubulars. No prior art remotely suggests such novel structure, nor the totally novel method of drilling, as described above which has truly revolutionized all previously know drilling structures and methods.

With respect to Claims 12, 13, 18 and 19 these claims recite the totally novel "handlers" whereby continuous handling of the tubulars may be accomplished in novel hand-over-hand motions. No prior art remotely suggests this

substantially more efficient operation of moving the tubulars into, or out of, engagement with the drill string so as to achieve even more commercially valuable operation.

For all of the above-stated reasons, all of the claims now present in the subject Application are firmly believed to be clearly allowable, and such action is respectfully solicited.

Respectfully submitted,

  
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